Gobanimo Microfinance

DIGNITY. FREEDOM. PROSPERITY.

COMPLIANCE

AML/CFT & KYC Public Summary

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Gobanimo Microfinance is committed to keeping illicit money out of its platform. Before any live financial activity, we operate the controls below, and we engage regulators in each operating city before first disbursement.

Our principles

1. **Risk-based customer due diligence** — checks scale with the risk and size of the relationship.
2. **No anonymous facilities** — every customer completes identity verification before any facility is opened.
3. **Screening before disbursement** — sanctions and politically-exposed- person (PEP) screening runs before money moves, not after.
4. **Ongoing monitoring** — repayment and mobile-money activity are monitored for patterns inconsistent with the customer's profile.
5. **Clear escalation** — suspicious activity is escalated to a named responsible officer; high-risk matters require founder-level approval.
6. **Record retention** — records are kept as applicable law and regulator expectations require.

Customer due diligence tiers

Tier	Typical customer	Minimum checks	Human review
Low	Repeat small-ticket customer	ID, phone ownership, sanctions/PEP screen, consent	Sampled
Medium	New customer or higher amount	Enhanced questionnaire, referee/vendor confirmation	Required if flags appear
High	PEP, adverse media, unusual activity	Enhanced due diligence	Always, with founder approval

What triggers escalation

Inconsistent identity or phone ownership; circular repayment patterns; transaction spikes inconsistent with the customer's profile; sanctions or PEP matches; unexplained third-party repayments; attempted use of multiple identities or devices.

Technology with human accountability

Automated agents may collect documents, classify risk, and prepare recommendations — but **no automated system can override a sanctions, PEP, or high-risk escalation gate**, and no raw personal data enters AI systems outside approved privacy controls. Every final decision is made by a trained officer, and every step is recorded in an append-only audit trail available to supervisors.

Working with regulators

We operate under a supervised-pilot posture: regulatory engagement begins before first live disbursement, pilot activity stays within approved capital, city, and customer limits, and pilot metrics are reported monthly to internal governance and, where agreed, to regulators. Our full AML/CFT policy, suspicious-transaction reporting procedure, and evidence pack are available to regulators and supervised partners on request.

Responsible officer: the Founder & Managing Director · gumfi.info@gmail.com